

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Civ. Action No. 3:16-md-02738 (FLW)
(LHG)

MDL No. 2738

*THIS DOCUMENT RELATES TO ALL
CASES*

**DECLARATION OF P. LEIGH O'DELL IN SUPPORT OF THE
PLAINTIFFS' STEERING COMMITTEE'S MEMORANDUM OF LAW
IN RESPONSE AND OPPOSITION TO DEFENDANTS JOHNSON & JOHNSON AND
JOHNSON & JOHNSON CONSUMER INC.'S NOTICE OF BANKRUPTCY
FILING AND STAY OF PROCEEDINGS**

I, P. Leigh O'Dell, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am a Principal at the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and serve as Co-Lead counsel of the Plaintiffs' Steering Committee in the *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation* (MDL No. 2738) before the United States District Court for the District of New Jersey. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

2. I submit this declaration in support of the *Plaintiffs' Steering Committee's Memorandum of Law in Response and Opposition to Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Notice of Bankruptcy Filing and Stay of Proceedings*, filed concurrently herewith.

3. On October 14, 2021 LTL Management LLC commenced a bankruptcy case (the “**Bankruptcy Case**”) by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code.

4. Attached hereto as **Exhibit A** is a true and correct copy of the *Declaration of John K. Kim in Support of First Day Pleadings* filed on October 14, 2021 and appearing at Dkt. No. 5 in the Bankruptcy Case (the “**First Day Declaration**”).

5. Attached hereto as **Exhibit B** is a true and correct copy of the *Voluntary Petition for Non-Individuals Filing for Bankruptcy* filed on October 14, 2021 and appearing at Dkt. No. 1 in the Bankruptcy Case (the “**Bankruptcy Petition**”).

6. Attached hereto as **Exhibit C** is a true and correct copy of the *Debtor’s Emergency Motion to Enforce the Automatic Stay Against Talc Claimants Who Seek to Pursue Their Claims Against the Debtor and Non-Debtor Affiliates* filed on October 18, 2021 and appearing at Dkt. No. 44 in the Bankruptcy Case (the “**Emergency Stay Motion**”).

Executed this 20th day of October, 2021, Montgomery, Alabama.

/s/ P. Leigh O’Dell

P. Leigh O’Dell